

EXHIBIT C

Gennari, Paul

From: Gennari, Paul
Sent: Wednesday, June 10, 2015 2:07 PM
To: Brian Buckley; Armen Nercessian; BMG; 'wkelley@hausfeld.com'; 'Michael O. Crain (mocrain@crainlawgroup.com)'; Andrew Bridges
Cc: Guinevere Jobson; David Hayes; Peterson, Douglas
Subject: RE: BMG et al v. Cox -- 6/8 letter
Attachments: 2015.06.08 - Gennari Letter.pdf

Brian, please provide a response to our 6/8 letter re disclosure of subscriber (attached) information by close of business today?

Regards,

Paul A. Gennari
Steptoe & Johnson LLP
1330 Connecticut Avenue, N.W.
Washington, DC 20036-1795
tel: (202) 429-6413
cell: (571) 265-5305
fax: (202) 429-3902
pgennari@steptoe.com

From: Gennari, Paul
Sent: Wednesday, June 10, 2015 1:15 PM
To: Brian Buckley; Armen Nercessian; BMG; 'wkelley@hausfeld.com'; 'Michael O. Crain (mocrain@crainlawgroup.com)'; Andrew Bridges
Cc: Guinevere Jobson; David Hayes; Peterson, Douglas
Subject: RE: BMG Rights Management (US) LLC and Round Hill Music LP v. Cox Enterprises, Inc., et al., Case No. 1:14-cv-1611 - application to Quash/Protective Order

Brian, this confirms that the deposition will take place tomorrow at our LA office, at 2121 Ave. of Stars, Suite 2800. Please confirm that the deposition will start at 9:00 am, and provide the names of those attending on your side so that we can inform security.

Regards,

Paul A. Gennari
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From: Gennari, Paul

Sent: Wednesday, June 10, 2015 1:06 PM

To: Brian Buckley; Armen Nercessian; BMG; 'wkelley@hausfeld.com'; 'Michael O. Crain (mocrain@crainlawgroup.com)'; Andrew Bridges

Cc: Guinevere Jobson; David Hayes; Peterson, Douglas

Subject: RE: BMG Rights Management (US) LLC and Round Hill Music LP v. Cox Enterprises, Inc., et al., Case No. 1:14-cv-1611 - application to Quash/Protective Order

Brian, we would be happy to conduct the depo at our offices. We are confirming that space is available and will be back in touch in the next 15 mins.

Regards,

Paul A. Gennari

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From: Brian Buckley [<mailto:bbuckley@fenwick.com>]

Sent: Wednesday, June 10, 2015 12:26 PM

To: Gennari, Paul; Armen Nercessian; BMG; 'wkelley@hausfeld.com'; 'Michael O. Crain (mocrain@crainlawgroup.com)'; Andrew Bridges

Cc: Guinevere Jobson; David Hayes; Peterson, Douglas

Subject: RE: BMG Rights Management (US) LLC and Round Hill Music LP v. Cox Enterprises, Inc., et al., Case No. 1:14-cv-1611 - application to Quash/Protective Order

Paul – Your letter is intellectually dishonest, factually false, legally baseless (your cited cases involve documents), and (in my view) unethical. It also sets a clear tone for your firm's approach to this litigation and the rules. But your letter is also now moot, as the Court denied your meritless motion (see attached).

In light of your bad-faith retraction of your offer to conduct Mr. Steele's deposition at your Century City offices, we will be forced to conduct the deposition at the Veritext location in Wilshire. Let me know in the next hour whether you would prefer to honor your offer and conduct the deposition at your offices.

B.

From: Gennari, Paul [<mailto:pgennari@steptoe.com>]

Sent: Wednesday, June 10, 2015 8:58 AM

To: Armen Nercessian; BMG; 'wkelley@hausfeld.com'; 'Michael O. Crain (mocrain@crainlawgroup.com)'; Andrew Bridges; Brian Buckley

Cc: Guinevere Jobson; David Hayes; Peterson, Douglas

Subject: RE: BMG Rights Management (US) LLC and Round Hill Music LP v. Cox Enterprises, Inc., et al., Case No. 1:14-cv-1611 - application to Quash/Protective Order

Counsel, please see the attached correspondence.

Regards,

Paul A. Gennari
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From: Armen Nercessian [<mailto:anercessian@fenwick.com>]
Sent: Wednesday, June 10, 2015 12:44 AM
To: Gennari, Paul; BMG; 'wkelley@hausfeld.com'; 'Michael O. Crain (mocrain@crainlawgroup.com)'; Andrew Bridges; Brian Buckley
Cc: Guinevere Jobson; David Hayes; Peterson, Douglas
Subject: RE: BMG Rights Management (US) LLC and Round Hill Music LP v. Cox Enterprises, Inc., et al., Case No. 1:14-cv-1611 - application to Quash/Protective Order

Counsel:

Please see the attached correspondence.

Best,

Armen Nercessian



ARMEN NERCESSIAN

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From: Gennari, Paul [<mailto:pgennari@steptoe.com>]
Sent: Tuesday, June 09, 2015 4:55 PM
To: Armen Nercessian; BMG; 'wkelley@hausfeld.com'; 'Michael O. Crain (mocrain@crainlawgroup.com)'; Andrew Bridges; Brian Buckley
Cc: Guinevere Jobson; David Hayes; Peterson, Douglas
Subject: RE: BMG Rights Management (US) LLC and Round Hill Music LP v. Cox Enterprises, Inc., et al., Case No. 1:14-cv-1611 - application to Quash/Protective Order

Brian, following-up on our call about Mr. Steele's deposition subpoena, you stated that regardless of our motion to quash his deposition filed in CDCal, you intend to show up on June 11 for his deposition, because, as you put it, he must show up for the deposition unless the Court orders otherwise. You provided no authority to support this claim and we are aware of no such authority. If you have such authority, please provide it to us today in writing.

We made clear on the call that since we timely filed our motion to quash, until the CDCal rules on the motion and orders otherwise, Mr. Steele is not required to attend the deposition. We thus informed you that we would not be presenting Mr. Steele for deposition on June 11, unless the Court orders otherwise.

We note that the location of the deposition in the subpoena is at our Steptoe office in LA. No one involved in this case is resident in the LA office and we will not be there on Thursday. Nor will Mr. Steele. The office has been informed that the deposition is not going forward. Thus, no one from Cox or your firm will be permitted in the office. Please inform the court reporter.

Regards,

Paul A. Gennari
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